

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

MARK STANALAJCZO, DDS,

Plaintiff,

Case No. 23-cv-11527

Hon. Matthew F. Leitman

v.

BRANDONN PERRY, et al.,

Defendants.

STIPULATION REGARDING IN CAMERA REVIEW

NOW COME Plaintiff and Defendants, through counsel, who stipulate to the following:

The parties, having discussed this matter on November 15, 2023, December 28, 2023, and January 19, 2024, stipulate that Defendants will provide to the Court all documents that have been withheld from production in connection with Plaintiff's prior discovery requests and that Defendants claim to be privileged, for an in camera review and determination. Said records shall include those falling within the attached privilege log. Defendants will provide the documents to the Court on or before February 2, 2024.

It is so stipulated.

/s/Dennis Dubuc
Dennis B. Dubuc (P67316)

/s/Timothy H. Howlett (w/perm.)
Timothy H. Howlett (P24030)

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/s/Frank J. Lawrence

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

MARK STANALAJCZO, DDS,

Plaintiff,

Case No. 23-cv-11527

Hon. Matthew F. Leitman

v.

BRANDONN PERRY, et al.,

Defendants.

ORDER REGARDING IN CAMERA REVIEW

Consistent with the stipulation of the parties,

IT IS HEREBY ORDERED that on or before February 2, 2024, Defendants shall provide to the Court all withheld documents that fall within one of Plaintiff's prior discovery requests and that Defendants claim to be privileged, for an in camera review and determination as whether a privilege has been properly applied.

s/Matthew F. Leitman

MATTHEW F. LEITMAN

UNITED STATES DISTRICT JUDGE

Dated: January 24, 2024

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

MARK STANALAJCZO, DDS,

Plaintiff,

Case No. 2:23-cv-11527

v

HON. MATTHEW F. LEITMAN
MAG. ELIZABETH A. STAFFORD

JAN HU, BDS, PhD, in her official capacity as Interim Dean of the University of Michigan School of Dentistry, BRANDONN PERRY, in his individual capacity, and LYNN JOHNSON, PhD, in her individual capacity,

Defendants.

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PRIVILEGE LOG

PRIVILEGE LOG

DOCUMENT DATE	TYPE	AUTHOR	RECIPIENT	PRIVILEGE	DESCRIPTION
10/20/22	Email	Christiane Squarize	Jacques Nor cc: Jan Hu Lynn Johnson	Attorney-Client Privilege	Email discusses attached email from Gloria Hage to Christiane Squarize, cc: Lynn Johnson, Kimberly Andrus and Sascha Matish, and email from Christiane Squarize to Gloria Hage providing legal advice.
08/22/22	Email	Chain of emails between Lynn Johnson and Gloria Hage	Copies to Kimberly Andrus, Jan Hu, Sascha Matish, Jacques Nor	Attorney-Client Privilege	Provision of legal advice.
09/26/22	Email	Chain of emails among Lynn Johnson, Gloria Hage and Jan Hu	Copies to Kimberly Andrus, Christiane Squarize and Jacques Nor	Attorney-Client Privilege	Provision of legal advice.
11/01/22	Email	Chain of emails among Lynn Johnson, Jacques Nor, Christiane Squarize, Jan Hu and Gloria Hage	Copy to Kimberly Andrus	Attorney-Client Privilege	Provision of legal advice.

DOCUMENT DATE	TYPE	AUTHOR	RECIPIENT	PRIVILEGE	DESCRIPTION
08/05/22	Email	Lynn Johnson	Jan Hu, Jacques Nor, Romesh Nalliah cc: Christiane Squarize	Attorney-Client Privilege	Discussing legal advice from Gloria Hage.
09/27/22	Email	Lynn Johnson	Erika Roberts cc: Jan Hu, Jacques Nor, Christiane Squarize	Attorney-Client Privilege	Discussion of legal advice from Office of General Counsel regarding October Executive Committee meeting.
07/18/22	Email	Lynn Johnson	Jacques Nor, Jan Hu	Attorney-Client Privilege	Paragraphs have been redacted because they reflect legal advice from Office of General Counsel.

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Date: November 8, 2023